

EXHIBIT E

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[Attorneys for clients as listed on signature page]

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)

(Jointly Administered)

**DECLARATION OF JEREMIAH F.
HALLISEY, ESQ. IN SUPPORT OF
JOINDER OF CERTAIN FIRE VICTIMS
IN WILLIAM B. ABRAMS MOTION TO
DESIGNATE IMPROPERLY SOLICITED
VOTES PURSUANT TO 11 U.S.C. §§
1125(B) AND 1126(E) AND BANKRUPTCY
RULE 2019**

Date: May 12, 2020

Time: 10:00 a.m.:

Place: Courtroom 17, 450 Golden Gate Ave.,
16th Floor, San Francisco, CA

I, Jeremiah F. Hallisey, declare as follows:

1. I am a member in good standing of the State Bar of California and am the attorney

1 of record for claimants/fire victims William O'Brien, Ming O'Brien, Fuguan O'Brien; Michael
2 Heinstein, Kye Heinstein, Karen Roberds. Anita Freeman; William N. Steel, and Clinton Reilly in
3 this proceeding.

4 2. I have personal knowledge of the facts stated herein and I could and would
5 competently and truthfully testify to those facts if called as witness.

6 3. This Declaration is submitted in support of the Joinder of Certain Fire Victims in
7 William B. Abrams Motion to Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§
8 1125(B) and 1126(E) and Bankruptcy Rule 2019 14 3.

9 4. Attached hereto as **Exhibit 1** is a true and correct copy of the Declaration of Karen
10 Lynn Ingalls, *Pro Per* Claimant and Fire Victim, dated May 7, 2020. Attached hereto as **Exhibit**
11 **2** is a true and correct copy of the Declaration of Debbie Pool, *Pro Per* Claimant and Fire Victim,
12 dated May 7, 2020.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed on May
14 10, 2020 at San Francisco California.

15
16 /s/ Jeremiah F. Hallisey
Jeremiah F. Hallisey
Hallisey and Johnson, PC
465 California Street, Suite 405
San Francisco, CA 94104-1812
Telephone: (415) 433-5300
Email: jfhallisey@gmail.com

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19 Attorneys for William, Ming, and Fuguan O'Brien;
20 Kye and Michael Heinstein; Clint Reilly; Karen
21 Roberds and Anita Freeman; and William N. Steel

22 FRANCIS O. SCARPULLA (SBN 41059)
23 PATRICK B. CLAYTON (SBN 240191)
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26 Attorneys for GER HOSPITALITY, LLC and
27 ADOLFO VERONESE FAMILY

28 QUENTIN L. KOPP (SBN 25070)
DANIEL S. MASON (SBN 54065)
THOMAS W. JACKSON (SBN 107608)

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Attorneys for Ken Born, Christine Born, Cathy
FERENCE, William FERENCE, Allen Goldberg, Robert
Johnson, Patricia Goodberg, Paul Goodberg,
Terence Redmond, Melissa Redmond, Sonoma
Court Shops, Inc., and Rita Godward

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2 **CERTIFICATE OF SERVICE**
3

4 I, Karen J. Chedister, declare as follows:

5 I am over the age of eighteen (18) years and not a party to the within action. My business
6 address is 465 California street, Suite 405, San Francisco, CA 94104.

7 On May 10, 2020, I served document(s) described as:

8
9 **DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF JOINDER**
10 **OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS MOTION TO**
11 **DESIGNATE IMPROPERLY SOLICITED VOTES PURSUANT TO 11 U.S.C. §§**
12 **1125(B) AND 1126(E) AND BANKRUPTCY RULE 2019**

13 on the interested parties in this action as follows:

14 BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing

15 ("NEF") for all parties and counsel who are registered ECF Users and those identified
16 below:

17 I declare under penalty of perjury under the laws of the United States of America that the
18 above is true and correct. This declaration was executed on May 7, 2020 at San Francisco,
19 California.

20 /s/ Karen J. Chedister

21 Karen J. Chedister, Esq.
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EXHIBIT 1 TO

**DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF
JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS
MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY
RULE 2019**

1 Karen Lynn Ingalls
108 Ivy Lane
2 Calistoga, CA 94515
3 Claimant

4
5 UNITED STATES BANKRUPTCY COURT
6 NORTHERN DISTRICT OF CALIFORNIA
7 SAN FRANCISCO DIVISION

8 In re:

9 PG&E CORPORATION,
10

11 -and-

12 PACIFIC GAS AND ELECTRIC
13 COMPANY,

14 Debtors.

- 15 ☐ Affects PG&E Corporation
16 ☐ Affects Pacific Gas and Electric Company
17 ☒ Affects both Debtors

18 * All papers shall be filed in the lead case,
19 No. 19-30088 (DM)
20

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

DECLARATION OF KAREN LYNN
INGALLS

21
22 I hereby declare under penalty of perjury that the following is true and correct to the best of
23 my knowledge, information, and belief:
24

25 1. I am a fire claimant in the above-referenced case. I incurred fire damage and losses at
26 8811 Franz Valley School Road, Calistoga, CA during the Tubbs Fire. My Proof of Claim is number
27 85774, filed on October 21, 2019. I am not represented by an attorney in the PG&E matter.
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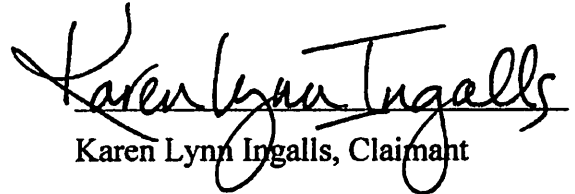
DECLARATION OF KAREN LYNN INGALLS

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2 2. As of May 6, 2020, I had not received the Disclosure Statement, Ballots and related
3 materials

4 I declare under penalty of perjury pursuant to the Laws of the State of California that, to the
5 best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that this
6 declaration was executed at Calistoga on May 7, 2020.

7 108 Ivy Lane

8 
Karen Lynn Ingalls, Claimant

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DECLARATION OF KAREN LYNN INGALLS

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EXHIBIT 2 TO

**DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF
JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS
MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY
RULE 2019**

1 Debbie Pool
121 Penzance Ave, #152
2 Chico, CA 95973
3 Claimant
4

5 UNITED STATES BANKRUPTCY COURT
6 NORTHERN DISTRICT OF CALIFORNIA
7 SAN FRANCISCO DIVISION

8 In re:

9 PG&E CORPORATION,

10 -and-

11 PACIFIC GAS AND ELECTRIC
12 COMPANY,

13 Debtors.

- 14 ☐ Affects PG&E Corporation
15 ☐ Affects Pacific Gas and Electric Company
16 ☒ Affects both Debtors

17 * All papers shall be filed in the lead case,
18 No. 19-30088 (DM)
19
20

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

DECLARATION OF DEBBIE POOL

21 I hereby declare under penalty of perjury that the following is true and correct to the best
22 of my knowledge, information, and belief:

23 1. I am a fire claimant in the above-referenced case. I incurred fire damage and
24 losses at 9183 Skyway in Paradise, CA during the Camp Fire. My Proof of Claim is number
25 13959, filed on October 4, 2019. I amended my Proof of Claim on March 11, 2020, to remove
26 Joseph M. Earley as my attorney.
27
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DECLARATION OF DEBBIE POOL

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2 2. I engaged Joseph M. Earley III to represent me in connection with my claims
3 against Debtors. At the time I engaged Mr. Earley, I did not understand that Watts Guerra would
4 also be representing me and managing my claim.

5 3. I have been urged and pushed to vote to approve the PG&E Plan of
6 Reorganization since the beginning of February 2020. Attached as Exhibit A are true and correct
7 copies of two emails urging me to accept the Plan and that I received in February 2020.

8 4. I told Watts Guerra that I was terminating their engagement on February 28,
9 2020, then again on February 29, 2020, and a third time on March 3, 2020. I spoke to Guy Watts
10 on March 9, 2020. He asked why I was terminating the relationship, so I gave him several
11 reasons. He raised his voice and argued with me. I felt rudely treated. I did not get confirmation
12 that they had closed my file until April 6, 2020.

13 5. Although Guy Watts told me he would close my file on March 12, 2020, I
14 continued receiving calls, e-mails, and texts URGING me to vote yes. In total, there were seven
15 texts, twelve calls, and three emails, all about voting through their portal even though I was no
16 longer a client. Attached as Exhibit B is a true and correct copy of an email I received at 8:23
17 AM urging me to accept the Plan. Attached as Exhibit C is a true and correct copy of the list of
18 phone messages I received from Watts Guerra urging me to vote to approve the Plan. Attached
19 as Exhibit D are true and correct copies of the text messages I received urging me to vote to
20 approve the Plan.

21 6. To my knowledge, at no time while Watts Guerra was representing me did I
22 receive any written or verbal disclosures from Watts Guerra regarding its line of credit or
23 financing arrangements with Centerbridge Partners or Apollo Capital.

24 I declare under penalty of perjury pursuant to the Laws of the State of California that, to
25 the best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that
26 this declaration was executed at 11 AM on May 7, 2020.

27 /s/ Debbie Pool

28 Debbie Pool

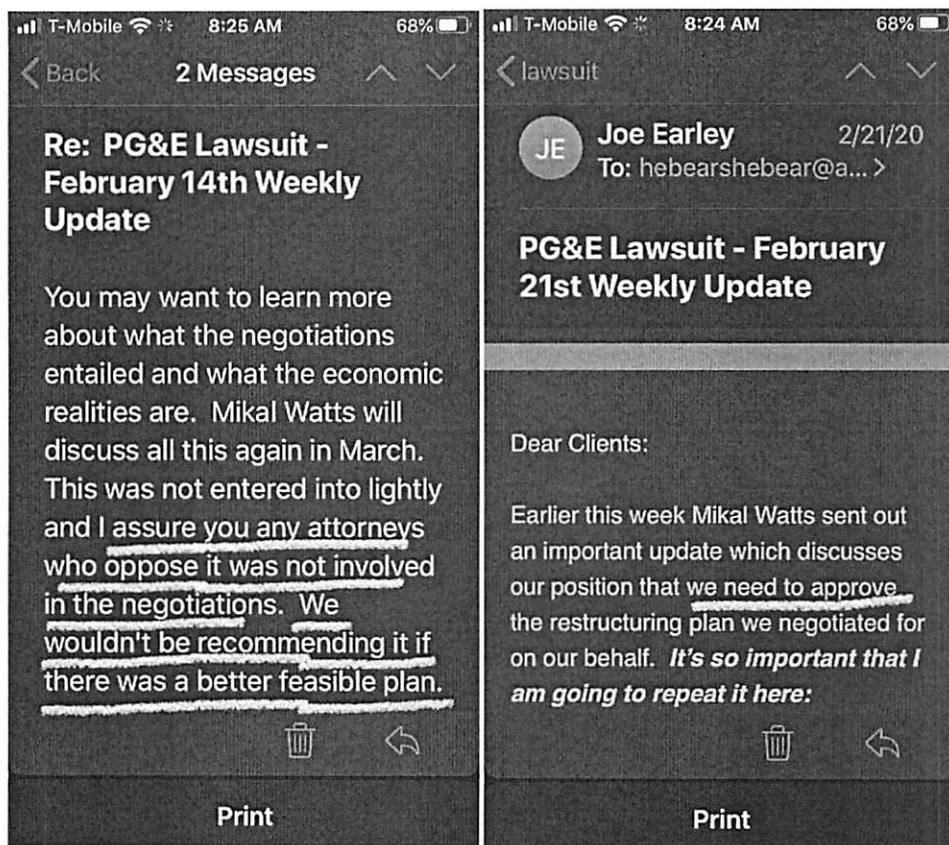
Claimant

DECLARATION OF DEBBIE POOL

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EXHIBIT A

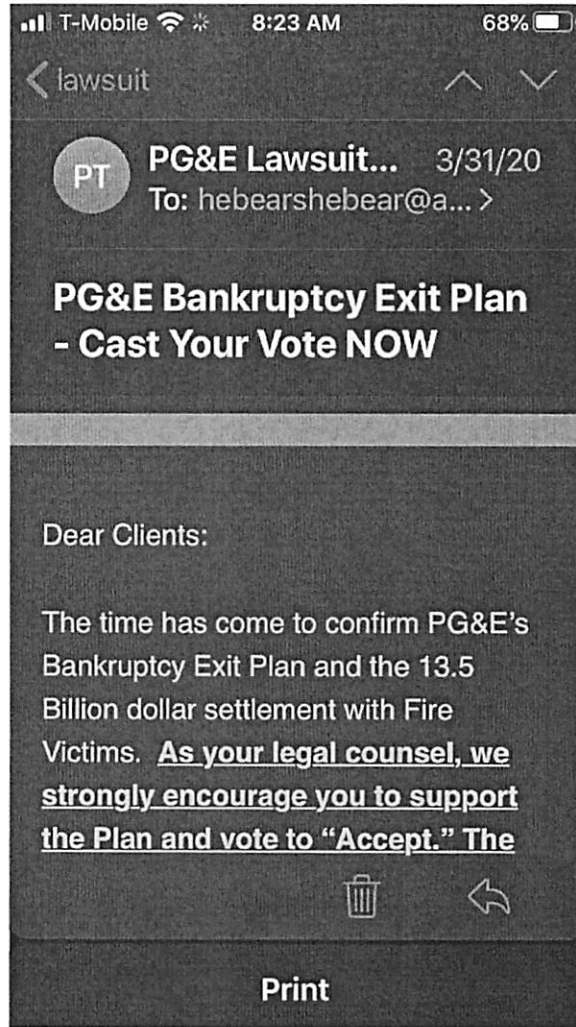
Vote Solicitation Prior to March 31



DECLARATION OF DEBBIE POOL

EXHIBIT B

Vote Solicitation on March 31



DECLARATION OF DEBBIE POOL

EXHIBIT C

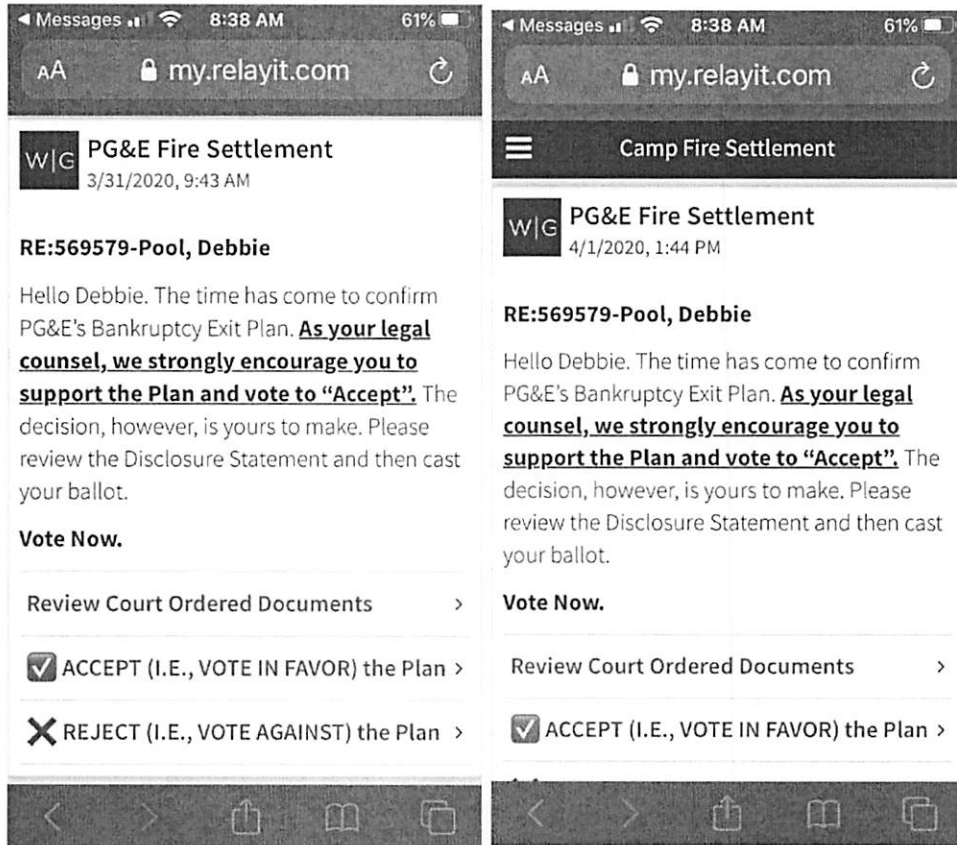
Voicemail List



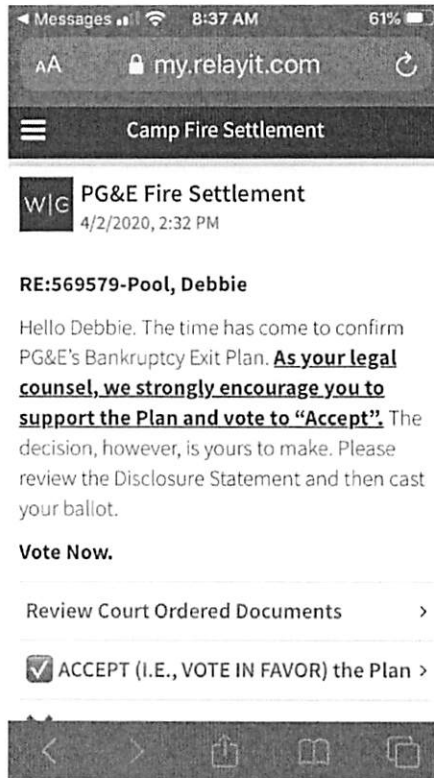
DECLARATION OF DEBBIE POOL

EXHIBIT D

Text Messages

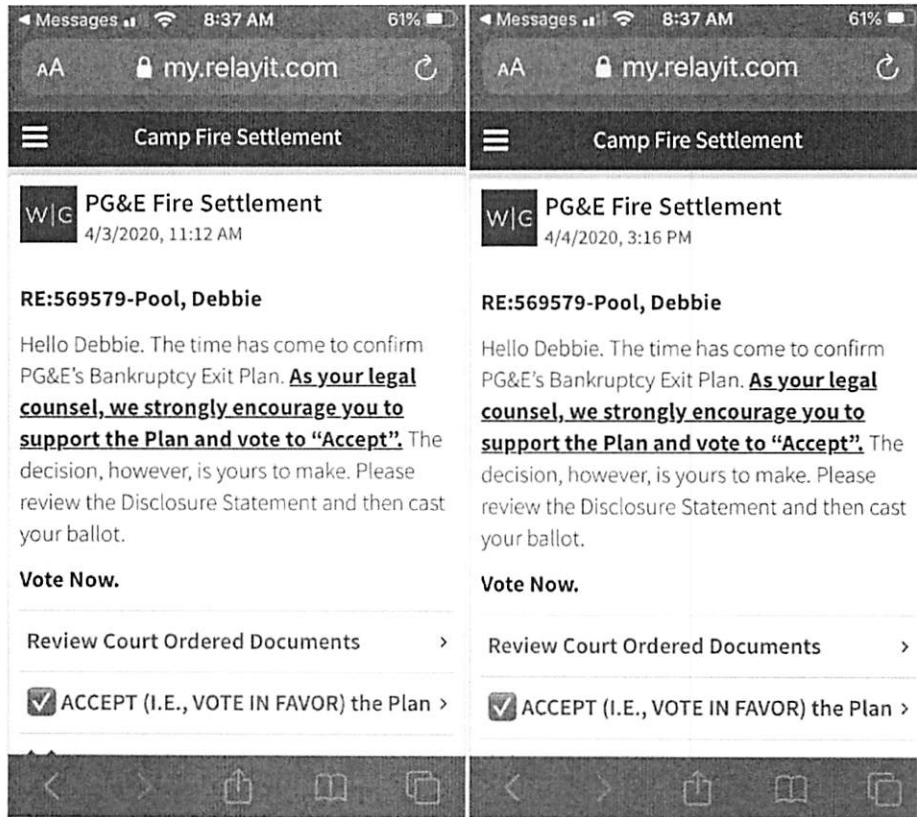


DECLARATION OF DEBBIE POOL



DECLARATION OF DEBBIE POOL

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DECLARATION OF DEBBIE POOL